

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
ABILENE DIVISION**

**JANICE B. SCHWARTZ AND
ROBERT GAYLE AMUNDSON,
PARTNERS DBA J & J
PROPERTIES,
Plaintiffs,**

v.

**CENTURY SURETY COMPANY,
Defendant.**

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**CIVIL ACTION NO. 1:11-CV-217-C**

**DESIGNATION OF EXPERT WITNESSES BY**  
**DEFENDANTS, JANICE B. SCHWARTZ AND ROBERT GAYLE**  
**AMUNDSON, PARTNERS DBA J & J PROPERTIES**

and specifically as it relates to this claim. He will also testify regarding the selection and qualification of an umpire, the qualifications of an umpire, the responsibilities and requirements of an umpire and the umpire process, both generally and specifically involved in this claim.

Mr. Taylor's expert opinions, the basis and reasons for his opinions, and his rate of compensation are contained in his report dated December 31, 2012, which is attached hereto as Exhibit 1 and which is incorporated herein by reference. A detailed description of Mr. Taylor's qualifications, including a list of other cases in which Mr. Taylor has testified or been retained as an expert witness within the last four years is also contained within Mr. Taylor's report attached hereto as Exhibit 1.

Jim Barr, Barr Roofing Company, P.O. Box 629, Abilene, Texas 79604; (325) 672-8417. Mr. Barr is the owner/principal shareholder and President of Barr Roofing Company of Abilene, Texas. Barr Roofing Company has been in the residential and commercial roofing business since 1964 and Mr. Barr has over 37 years of experience in investigation and repair of structural and material failures in residential and commercial roofs in Texas. Mr. Barr will testify as to the effects of the April 24, 2011 hail storm on the building/property of J&J and the damage caused by the hail, the extent of the loss and the amount of the damage. Mr. Barr will testify that the roofs cannot be repaired and should be replaced and will offer his opinions on the costs which will be incurred to replace the damaged roofs.

Mr. Barr's expert opinions, the basis and reasons for his opinions, and his rate of compensation are contained in his report dated December 31, 2012, which is attached hereto as Exhibit 2 and which is incorporated herein by reference. A detailed description of Mr. Barr's qualifications, including a list of other cases in which Mr. Barr has testified or been retained as an expert witness within the last four years is also contained within Mr. Barr's report attached hereto as Exhibit 2.

Kenneth L. Maxwell, Jr., The Law Offices of Kenny Maxwell, P.C., 100 East Third Street, Sweetwater, Texas 79556; 325-236-6691. Mr. Maxwell's expert opinions, the basis and reasons for his opinions, the facts or data considered by him in forming his opinions, his rate of compensation, a detailed description of his qualifications, a list of authored publications and a list of other cases he has testified or been retained as an expert witness is attached as Exhibit 3.

Mr. Maxwell will testify as to the reasonableness and necessity of the attorney's fees and expenses incurred by J&J and will testify about the conduct of Century Surety Company and its agents and representatives in the handling of J&J claim and loss. All documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for him in anticipation of his testimony as well as a list of cases in which he has testified by deposition or at trial during the last four years are identified in Mr. Maxwell's report.

## II.

J&J will rely upon the expert opinions and testimony of the following non-retained testifying expert:

Billy W. Boone, 104 Pine Street, Suite 705, Abilene, Texas 79601; (325) 695-7460. Mr. Boone has over 30 years experience as a practicing attorney, also served as a United States Magistrate Judge for the Northern District of Texas for 16 years. Mr. Boone is expected to testify generally and specifically concerning the appraisal and umpire process in the instant case including the qualifications and responsibilities of the appraisers selected by the parties, the general requirements and qualifications for umpires, his fulfillment of those requirements and qualifications, the information and input provided by the appraisers as well as his rationale and reasoning which lead to the award in this matter dated August 30, 2012. Mr. Boone's qualifications, listing of prior testimony and publications are fully set forth in the attached Exhibit 4.

III.

J&J hereby reserves the right to elicit and offer expert testimony of any or all of the experts designated by Century Surety Company.

Respectfully submitted,

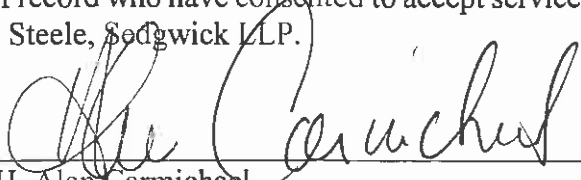
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and Robert Gayle Amundson, Partners dba  
J&J Properties

**CERTIFICATE OF SERVICE**

This is to certify that on December 31, 2012, I electronically filed the foregoing document with the Clerk of the Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented to accept service of this document by electronic means: L. Kimberly Steele, Sedgwick LLP.

  
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H. Alan Carmichael